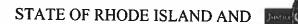
Exhibit A





SUPERIOR COURT

SUMMONS

	Civil Action File Number PC-2020-05225
Plaintiff Cheryl Jean	Attorney for the Plaintiff or the Plaintiff
v. MOTASEM AL-YACOUB, MD et al.	Address of the Plaintiff's Attorney or the Plaintiff
Defendant	TOP/IDA
Licht Judicial Complex	Address of the Defendant
Providence/Bristol County	400 Stanley St Fall River MA 02720
250 Benefit Street	Fall River MA 02720
Providence RI 02903 (401) 222-3250	

TO THE DEFENDANT, The Family HealthCare Center at SStar:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 7/20/2020.	/s/ Henry Kinch
	Clerk

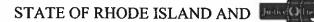
Witness the seal/watermark of the Superior Court

A TRUE COPY ATTEST DENNIS N. MARTEL. CONSTABLE # 6207 DATE: 8-2020

SUPERIOR COURT

Plaintiff	Civil Action File Number
Cheryl Jean	PC-2020-05225
V.	
MOTASEM AL-YACOUB, MD et al.	
Defendant	

PROOF OF SERVICE
I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, The Family HealthCare Center at SStar, by delivering or leaving said papers in the following manner:
☐ With the Defendant personally.
At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person of suitable age and discretion Address of dwelling house or usual place of abode
AgeRelationship to the Defendant
With an agent authorized by appointment or by law to receive service of process. Name of authorized agent
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.
☐ With a guardian or conservator of the Defendant. Name of person and designation
☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation





PROVIDENCE PLANTATIONS

SUPERIOR COURT

Upon a private corporation, domestic or foreign:					
 □ By delivering said papers to an officer or a managing or general agent. Name of person and designation □ By leaving said papers at the office of the corporation with a person employed therein. Name of person and designation □ By delivering said papers to an agent authorized by appointment or by law to receive service of process. 					
			Name of authorized agent	And the state of t	
			If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.		
			☐ I was unable to make service after the following reas	onable attempts:	
SERVICE DATE: ///	SERVICE FEE \$				
Month Day Year	ADLE				
Signature of SHERIFF or DEPUTY SHERIFF or CONST.	ABLE TO SELLET ASSOCIATION OF LANGUAGE				
SIGNATURE OF PERSON OTHER THAN A SHERIFF	or DEPUTY SHERIFF or CONSTABLE MUST BE				
NOTARIZED.					
Signature					
State of					
County of					
On this day of, 20,	before me, the undersigned notary public, personally				
appeared	personally known to the notary				
	tory evidence of identification, which was o be the person who signed above in my presence,				
and who swore or affirmed to the notary that the contents knowledge.					
Notary	Public:				
My co	mmission expires:				
Notary	identification number:				

Page 2 of 2

in Providence/Bristol Columb Course (Columb Course) | Page 5 of 9 Page 5 of 9 Page 5 of 9 Page 10 #: 10 nitted: 7/17/2020 10:45 PM

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STATE OF RHODE ISLAND

PROVIDENCE COUNTY, SC.	SUPERIOR COURT
CHERYL A. ST. JEAN)
Plaintiff,)
)
v.) CA No:
MOTASEM AL-YACOUB, MD;	<i>)</i> }
EAST BAY NEUROLOGY, P.C.;)
DAVID P. CARTER, MD; the FAMILY)
HEALTHCARE CENTER at SSTAR;)
Defendant.)

COMPLAINT

Parties

- 1. Plaintiff, Cheryl St. Jean, (hereinafter "St. Jean") is a natural person residing in Providence County Rhode Island;
- 2. Defendant, Motasem Al-Yacoub, MD, ("Dr. Al-Yacoub") is, and at all times herein mentioned was, a Rhode Island registered physician with Rhode Island License number MD09501 and CMD09501, licensed by the State of Rhode Island. Dr. Al-Yacoub holds himself out as a specialist in neurology.
- 3. Defendant East Bay Neurology, P.C. is upon information and belief a Rhode Island Registered Professional Corporation.
- 4. Defendant, David P. Carter, MD, ("Dr. Carter") is, and at all times herein mentioned was, a Rhode Island registered physician with Rhode Island License number CMD05623, licensed by the State of Rhode Island, and license number 44704 issued by the Commonwealth of Massachusetts.
- 5. Defendant The Family HealthCare Center at SSTAR is upon information and belief, a Massachusetts registered nonprofit.

Jurisdiction, Venue, and Jury Demand

6. This Court has jurisdiction over this matter pursuant to R.I. Gen. Laws § 8-2-1, et. seq. as the amount in controversy exceeds \$10,000.

in Providence/@istal@columb(Superio)@suB-JJM-LDA Document 1-1 Filed 12/04/20 Page 6 of 9 PageID #: 11 nitted: 7/17/2020 10:45 PM

lope: 2668749 ewer: Victoria H

7. Venue is proper in the Providence County Superior Court as the events giving rise to the allegations contained in this complaint occurred within the territorial bounds of this Court.

8. Plaintiff Demands a trial by jury for all claims so triable.

Preliminary Factual Allegations

- 9. In or about July of 2015 Plaintiff, St. Jean, complained to her Primary Care Physician Dr. David Carter that she was experiencing a numbness and tingling in her feet and an unsteady gait. On Dr. Carter's referral, Ms. St. Jean began treating with Dr. Al-Yacoub who diagnosed her with underlying diabetic polyneuropathy.
- 10. Over time Ms. St. Jean continued to treat with Dr. Al-Yocoub while her symptoms progressively worsened. Over this time, Dr. Al-Yacoub provided several different prescription medications, none of which were effective in fixing her worsening symptoms. During several follow up visits, Ms. St. Jean consistently reported worsening balance, restlessness in her legs, numbness, tripping, and falling.
- 11. In addition to her follow up appointments with Dr. Al-Yacoub Ms. St. Jean was also followed by her primary care Physician, Dr. David P. Carter. Ms. St. Jean made the same complaints to Dr. Carter of worsening balance, restlessness in her legs, numbness, tripping, and falling, that she made to Dr. Al-Yacoub.
- 12. Notwithstanding Ms. St. Jean's ongoing and worsening condition, neither Dr. Al-Yacoub nor Dr. Carter ordered diagnostic imaging of Ms. St. Jean's spine.
- 13. In or about October of 2017 Plaintiff was seen by Dr. Alan H. Daniels, MD, ("Dr. Daniels") who ordered diagnostic imaging on her spine. She was subsequently diagnosed with a large tumor on her spine which required surgery to remove.

Count I - Medical Malpractice as to Motasem Al-Yacoub, MD and East Bay Neurology, P.C.

- 14. Plaintiff incorporates the allegations contained in paragraphs 1 through 13 of this Complaint as though fully set forth herein.
- 15. As Plaintiff's treating Neurologist Dr. Al-Yacoub under the applicable standard of medical care owed a duty to Plaintiff.
- 16. Notwithstanding Plaintiff's reliance on Dr. Al-Yacoub's professional skills and representations of competence, Dr. Al-Yacoub did negligently fail to order diagnostic imaging of plaintiff's spine, and did otherwise fail to undertake sufficient steps to accurately detect, diagnose and treat plaintiff's spinal tumor all in violbreachand breach of the standards of care to be exercised by a licensed physician who holds himself out as a specialist in Neurology.

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17. At all times relevant hereto Defendant East Bay Neurology, P.C. was Dr. Al-Yacoub's employer and Dr. Al-Yacoub was acting as an employee, agent, or servant of East Bay Neurology, P.C. such that East Bay Neurology is liable for the professional conduct and negligence of Dr. Al-Yacoub.

- 18. As a direct and proximate cause of the negligence of the Defendants, and each of them, Plaintiff suffered injuries to her health, all of which have caused Plaintiff great mental, physical, and nervous pain and suffering.
- 19. As a direct and proximate cause of the negligence of the Defendants, and each of them, Plaintiff has incurred and may incur future medical, hospital, and other treatment expenses and costs, and lost earnings and/or earnings capacity.

WHEREFORE, Plaintiff prays for damages including medical and related expenses, pain and suffering, loss of earnings, and loss of earnings capacity; that Plaintiff be awarded costs, pre and post judgment interest, and fees; and that Plaintiff be awarded all other relief deemed just and proper under the circumstances.

Count II - Medical Malpractice as to David Carter M.D. and The Family Healthcare Center at SSTAR

- 20. Plaintiff incorporates the allegations contained in paragraphs 1 through 19 of this Complaint as though fully set forth herein.
- 21. As Plaintiff's treating Primary Care Physician Dr. Carter under the applicable standard of medical care owed a duty to Plaintiff.
- 22. Notwithstanding Plaintiff's reliance on Dr. Carter's professional skills and representations of competence, Dr. Carter did negligently fail to order diagnostic imaging of plaintiff's spine, and did otherwise fail to undertake sufficient steps to accurately detect, diagnose and treat plaintiff's spinal tumor all in violation and breach of the reasonable standards of care to be exercised by a licensed physician.
- 23. At all times relevant hereto Defendant The Family Healthcare Center at SSTAR was Dr. Carter's employer such that he was acting as it's employee, agent, and/or servant and as such The Family Healthcare Center at SSTAR is liable for Dr. Carter's professional conduct and negligence.
- 24. As a direct and proximate cause of the negligence of the Defendants, and each of them, Plaintiff suffered injuries to her health, all of which have caused Plaintiff great mental, physical, and nervous pain and suffering.
- 25. As a direct and proximate cause of the negligence of the Defendants, and each of them, Plaintiff has incurred and may incur future medical, hospital, and other treatment expenses and costs, and lost earnings and/or earnings capacity.

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WHEREFORE, Plaintiff prays for damages including medical and related expenses, pain and suffering, loss of earnings, and loss of earnings capacity; that Plaintiff be awarded costs, pre and post judgment interest, and fees; and that Plaintiff be awarded all other relief deemed just and proper under the circumstances.

Dated: July 17, 2020

Cheryl A. St. Jean By her attorney

/s/ Matthew Fabish, Esq. #8019
/s/Christopher M. Lefebyre, Esq. #4019
Consumer & Family Law Center of
Claude F. Lefebyre | Christopher M. Lefebyre, PC
PO Box 479 • Pawtucket • RI • 02862
Tel: (401) 728-6060 • Fax: (401) 728-6534
chris@lefebyrelaw.com

CERTIFICATE OF SERVICE

I hereby certify that, on 17 July 2020

I filed and served this document through the electronic filing system on the following parties: ALL SERVICE CONTACTS. The document electronically filed is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/Matthew L. Fabisch, Esq.

See this notice in Cambodian, Spanish, and Portuguese on the attached pages.

Españel: Vésse esta notificación en camboyano, español y portugués ou las páginas adjuntas.

Pertuguês: Leia esta notificação em cambojano, espanhol a português nea páginas em anexo.

NOTICE



You have a case in the Rhode Island state court system.

You have the right to an interpreter at no cost to you.

Rhode Island Supreme Court Executive Order 2012-05 states that when a Limited-English Proficient (LEP) person appears in court, the Rhode Island Judiciary will provide a free authorized interpreter for the defendant, plaintiff, witness, victim, perent of a juvenile, or someone with a significant interest in the court proceeding. This interpreting service is provided at no cost to the parties and in all types of cases, both civil and criminal. Court interpreters work in all the courthouses of the Rhode Island state court system.

To schedule an laterpreter for your day in court, you have the following options:

- Call the Office of Court Interpreters at (401) 222-8710, or
- Send an omail message to interpreterfeedback@courts.ri.cor, or
- Visit the interpretors' office to schodule an interpretor: 3.

The Office of Court Interpreters Light Judicial Complex Fourth Floor, Room 401 250 Benefit Street Providence, RI 02903

When requesting an interpreter, please provide the following information:

- . The name and number of your case
- The language you are requesting
 The date and time of your hearing
 The location of your hearing
- · Your name and a telephe ne number where we can reach you or your lawyer

For more information in Portuguese, Russian, and Spanish, including a listing of court forms that are available in Spanish, please visit our website on the internet: http://www.courts.ri.gov/interpreters/englishversion/default.

To request a translation of this notice into any other language, please call the Office of Court interpreters at (401) 222-8710. It would be helpful to have an English speaker with you when you call.

The Rhode Island Judiciary is committed to making the courts accessible to all.

The Office of Court Interpreters Licht Aufleini Complex Fourth Floor Room 401 250 Benefit Street Providence, RI 02903

See this notice in Cambodiau, Spanish, and Portuguese on the attached pages. yame: SAMPLE: [Véase esta notificación en camboyano, español y portugoás en las pá-ganadas. Véase esta notificación en camboyano, español y portugués en las páginas ac Portugues: Lois cata notificación em camboyano, español e portuguis ens páginas em és en las páginas adjuntas. Las nas páginas em anexo.



NOTIFICAÇÃO

V. Ex.ª tem um processo em curso no sistema judiciário do Estado de Rhode Island.

V. Ex.º tem direito aos serviços gratuitos de um intérprete.

A Ordem Executiva 2012-05 do Supremo Tribunel de Rhode Island provê que quando uma pessoa com conhecimentos limitados da lingua inglesa (Liested-English Proficient) (LEP) comparece em tribunel, a Administração Indiciária de Rhode Island disponibiliza-lhe granitamente os serviços de um intérprete suscrizado a um réu, autor, estemunha, vitima, pai ou mile de um nosano en alguêm com interesses significativo no processo judicial. O serviço de intérprete é prestado granitamente às partes e em todos os tipos de processos, sejam eles civis ou pensis. Os intérpretes do tribunal trabulham em todos os tibunais do sistema judiciário do Estado de Rhode Island.

radar en aerviços de son intérprete para e son dia no tribunal, tem as seguintes opções:

- Talafonar para e Gabinete de Intérpretes Judiciais através de n.º (401) 222-8710, ou
- Laviar uma mensagum de correio cistrónico para <u>interpreterfeelback/Atmarts.ri.gov.</u> ««
 - or-se no gabinote de intérprotes para agondar os serviços de um intérprote:

Gabinete de Intérpretes Judiciais Complexe Judiciai Licht Quartu Piso, Sain 401 250 Benefit Street Providence, RI 02903

Quando solicitar es serviços de um intérprete deve fornecer se seguintes dados:

- O nome e número do seu processo
 O lifloma que solicita
 A date e hora de sua sudifincia
 O local da sua audifincia

- O sun nome e un némero de telefene para o podermes contactar a si ou se sen advegado

Para obser mais informações em português, russo e espanhol, incluindo uma lista dos formulários judiciais disponíveis em espanhol, visite o nosso website na internet: http://www.courta.ti.gov/huterprejes/cagishversion/default.aspxi.

Para solicinar uma tradução desta notificação para qualquer outro idioma, telefone para o Gabineto de Intérpretes Judiciais através do número (401) 222-8710. Recomenda-es que estaja acompanhado por alguém que fiale inglês quando finar a channela.

A Administração ludiciária de Rhodo faland está empenheda em tornar os tribunais acessivais para todos

binete de Intérpretes Judicials Complexo Judicial Licht Quarto Pieo, Sain 401 250 Humelts Street Providence, RI 02903

See this notice in Combedian, Spanick, and Portuguese on the artached pages, at: Vénne max notificación en camboyano, español y perruguals can las plajans adjuntas, pular. Leia esta notificação em cambojano, español e portuguêns nos paginas era asaxo.

AVISO



Usted tiene un caso en el sistema judicial de Rhode Island.

Usted tiene el derecho a tener un intérprete sin costo para usted.

La Orden Ejecutiva 2012-05 del Tribusal Supremo da Rhode Island dicta que cuando una persona que tiene un dominio limitado del lagide (LESP) comparece este la certe, el Sistema Jackies de Rhode Island le proveert un invisprete estorizado gratis ses didemandando, desandando, testigo, víctima, padre de un menor de oche de senga con un interés te est el proceso de la corte. Este servicio de interpretación en le proveera sin costo alguno a los perticipantes en

ume ut se processo de us corres. Lisse sus victo de memprenereas en se provincias sus como en ses de ceso, ses civil o ponte. Arpreses judiciales trabajan en codos los tribunales del Sésteum Judicial de Rhode Island.

Para selicitar un intérprete para se compersonncia un el tribunal, usted tiene les signientes opciones:

- 1. Liamar a la Ofician de Intérpretos en el tribunel el 401-222-8710 ;
- 2. Mandar un corres electrónico a interpretariendizacidi courtari gov; o
- 3. Presentarse a la Offician de Intérpretes para solicitar un intérprete:

The Office of Court Interpreters Licht Judicial Complex Caurto Flos, Officina 461 A-B 250 Bosofit Street Providence, RI 62903

Al selicitar un intérprets, per favor proven la signicute informaci

- a El nombre y el número de su caso
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- o Dánde ya a tamar lagar sa amiliancia
- Se nombre y número de taléfono por el casi nos podamos poner en contacto con usted o con su

Para obtener más información en portugués, ruso o espatiol, incluyendo una lista de formularios de la curte que están disposibles en espatiol, vicito muestra platina de internet:

http://www.comis.cl.gov/Interpreters/englishversion/default.comi.

tr la traducción de este aviso en cualquier etro idioma, por favor liazue a la oficioa de intérpretez al (401) 222-8710. Ayudaría si ustod puode estar en compañía de una persona que habla inglés cuando liarne.

note a proporcioner a todes las personas mejor acceso a los tribunales. El sistema jurídico de Rhode Island se compe

The Office of Court Interpreters
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Fourth Floor Room 401
250 Benefit Strost
Providence, RI 62903

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លេចក្តីពួនជំណឹង



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The Office of Court Interpreters Licht Judicial Complex Fourth Floor, Room 401 250 Benefit Street Providence, RI 02903

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Lichs Judicial Complex Fourth Floor Room 401 250 Boundt Street Providence, RI 02903